

Wendy Musell, State Bar No 203507
LAW OFFICES OF WENDY MUSELL
180 Grand Ave. Suite 1300
Oakland, CA 94612
Tel. (510) 270-2252
Fax: (510) 228-1391
Email: wmusell@wendymuselllaw.com

Attorney for Plaintiff
Jessica Bolton

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JESSICA BOLTON

Plaintiff,

v.

GAVIN NEWSOM, GOVERNOR OF THE
STATE OF CALIFORNIA, KATHLEEN
ALLISON, SECRETARY CALIFORNIA
DEPARTMENT OF CORRECTIONS AND
REHABILITATION, SERGIO BUSTOS,
GABRIEL LOPEZ, JOSE VALENCIA,
ALLEN BOWMAN, EMMANUEL
RAMIREZ; AND DOES 1-50, INCLUSIVE,

Defendants,

) Case No. 21-CV-03466YGR
)
) **STIPULATION AND ORDER**
) **EXTENDING THE TIME FOR**
) **PLAINTIFF TO SERVE WRITTEN**
) **DEMAND AND REQUEST TO**
) **RESCHEDULE SETTLEMENT**
) **CONFERENCE WITH MAGISTRATE**
) **JUDGE RYU**
)
) Hon. Yvonne Gonzalez Rogers
) Magistrate Judge Donna M. Ryu (For
) Settlement Conference)
)
)
)
)
)

- 1 1. WHEREAS, per Docket No. 55, the above matter was referred to Magistrate Judge Donna
2 M. Ryu for settlement purposes, with a settlement conference date of July 5, 2022.
- 3 2. WHEREAS, per Docket No. 54, the Court ordered Plaintiff to provide Defendant with a
4 written demand no later than June 6, 2022.
- 5 3. WHEREAS, at the time Judge Ryu issued her scheduling orders (February 16, 2022),
6 Plaintiff did not have any conflict with the scheduled July 5 Settlement Conference.
7 However, subsequent to this order, a March 28, 2022 trial date involving Plaintiff's
8 counsel was continued and reset for June 20, 2022.
- 9 4. WHEREAS, Plaintiff's counsel verbally informed Defense counsel in this action of the
10 possibility of the need to reschedule the Settlement Conference if the matter reset for trial
11 for June 20 did not resolve.
- 12 5. WHEREAS, as of May 31, 2022, Plaintiff's counsel concluded that the matter set for trial
13 on June 20, 2022, in the Superior Court of the County of Los Angeles will proceed to trial
14 on that date and is scheduled to conclude July 15, 2022. As such, the trial will not be
15 completed prior to the July 5, 2022 Settlement Conference. Plaintiff's counsel cannot
16 attend the July 5th Settlement Conference given trial obligations.
- 17 6. WHEREAS, on May 31, 2022, Plaintiff's counsel so informed Counsel for Defendant in
18 this action and sought agreement to extend the deadline for Plaintiff to provide Defendant
19 with a written demand (Docket No. 54) and to request a continuance of the July 5, 2022
20 Settlement Conference. Counsel for Defendant agreed. The parties are presently meeting
21 and conferring to secure mutually agreeable dates to submit to Judge Ryu.
- 22 7. The parties hereby stipulate to extend the time for Plaintiff to provide Defendant with
23 a written demand to 30 days prior to the rescheduled Settlement Conference, as set by
24 Judge Ryu.

25 SO STIPULATED.

1 Dated: June 2, 2022

2 By: s/ Wendy Musell
3 Wendy Musell
4 LAW OFFICES OF WENDY MUSELL
5 Attorney for Plaintiff
6 JESSICA BOLTON

7 Dated: June 2, 2022

8 By: s/ Michael Purcell
9 Michael Purcell, Deputy Attorney General
10 Attorneys For Defendants GAVIN NEWSOM,
11 KATHLEEN ALLISON, JOSE VALENCIA,
12 GARCIA LOPEZ

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 Dated: June 3, 2022

